

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ATLANTIC RECORDING
CORPORATION, LAFACE
RECORDS LLC, SONY MUSIC
ENTERTAINMENT, UMG
RECORDINGS, INC., WARNER
BROS. RECORDS INC.,

Plaintiffs,

v.

SPINRILLA, LLC and JEFFERY
DYLAN COPELAND,

Defendants.

**DECLARATION OF
CARLOS LINARES IN
SUPPORT OF
PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

I, Carlos Linares, have personal knowledge of the facts stated below and, under penalty of perjury, hereby declare:

1. I am Vice President, Anti-Piracy Legal Affairs for the Recording Industry Association of America, Inc. ("RIAA"), where I have been employed for over seventeen years. My office is located at 1025 F Street, N.W., 10th Floor, Washington DC 20004. I submit this Declaration in support of Plaintiffs' Motion for Partial Summary Judgment.

2. As Vice President, Anti-Piracy Legal Affairs, I am responsible for evaluating and contributing to online strategies for the RIAA, including oversight of the investigations into online infringement of copyrighted sound recordings. As such, this Declaration is based on my personal knowledge and, if called upon to do so, I would be prepared to testify as to its truth and accuracy.

3. The RIAA is a not-for-profit trade association whose member record companies create, manufacture, and/or distribute the great majority of all legitimate sound recordings produced and sold in the United States. The RIAA's member record companies include the Plaintiffs in this litigation and comprise the most vibrant music industry in the world. A critical part of the RIAA's mission is to assist its member companies in protecting their intellectual property in the United States and in fighting against online and other forms of piracy.

4. "Spinrilla" is a music streaming and download service that operates via an Internet platform (<http://www.spinrilla.com>) and via mobile apps for the iOS and Android operating systems. Spinrilla is a popular service. Millions of users have visited the Spinrilla website and millions more have downloaded the Spinrilla apps.

5. As described below, I have been involved for over a year in examining piratical activities conducted on and through this service.

DMCA AGENT STUDY

6. On numerous occasions beginning in 2016 and ending on July 27, 2017, I or members of my investigative team have visited <http://www.spinrilla.com>, to search for information by which to contact an agent designated by Spinrilla to receive notifications of claimed copyright infringement. On these visits, we have found an email address – legal@spinrilla.com – under a section of the website labeled “DMCA.” My team and I have been unable to find any other contact information on the Spinrilla site for a designated agent, such as a name, address, or phone number.

7. On 41 separate occasions, ranging in time from July 19, 2016 to July 27, 2017, I or an RIAA investigator acting under my direction visited the U.S. Copyright Office website in an effort to locate a registered agent for Spinrilla, LLC. On these visits, we navigated to the Copyright Office website’s Directory of Service Provider Agents for Notification of Claims of Infringement. When browsing the “old directory” (maintained by the U.S. Copyright Office prior to December 1, 2016), we searched for DMCA Agents beginning with the letter “S” to see if a registered agent was listed for Spinrilla, LLC. When browsing the “new directory” (maintained by the U.S. Copyright Office after December 1, 2016), we utilized the website’s search function by typing in the word “Spinrilla.” Using either method, we were unable to find any registered agent for Spinrilla, LLC.

8. The RIAA's searches indicate that Defendants have not registered a designated DMCA agent for Spinrilla with the U.S. Copyright Office.

REPEAT INFRINGER STUDY

9. Between March 4, 2015 and February 6, 2017, investigators under my direction sent 59 notices of infringement of Plaintiffs' sound recordings to Spinrilla. These notices requested that Spinrilla remove 407 identified sound recordings from its service.

10. In sending these takedown notices, the RIAA acted on behalf of and with authorization from Plaintiffs. Each of these takedown notices declared, under penalty of perjury, that the RIAA was authorized to represent the Plaintiffs. Each of these takedown notices: (a) identified the sound recordings at issue by artist and title, identified URLs at which the sound recordings could be located on the Spinrilla website, and requested that Spinrilla "remove the files from your system, including any mirror or duplicate copies;" (b) declared, under penalty of perjury, that the RIAA had a good-faith belief that Spinrilla's use of the identified sound recordings infringed Plaintiffs' copyrights; and (c) contained contact information for and an electronic signature of the authorized RIAA investigator.

11. Spinrilla sent the RIAA an email message confirming its receipt of each of these takedown notices.

12. The takedown notices sent by my team of investigators included a targeted set of notices sent to Defendants at least once a week, every week, between July 27, 2016 and November 11, 2016 (the “Takedown Notices”). These 23 notices constituted what my team called a “Repeat Infringer Study.” The study was directed not only at stopping the infringements identified in each notice, but also at analyzing whether Spinrilla would take action to terminate the accounts of users that repeatedly posted copyrighted sound recordings without authorization to do so. The study focused on nine specific accounts: DJ Dirty Dollarz, DJ Miles, DJ HyDef, DJ Creative Mind, DJ ASAP, HurricaneMixtapes.com, DJ Trey Cash, DJ 837, and DJ Fiestaboi (the “Repeat Infringers”).

13. Based on what my investigative team and I had already observed on the Spinrilla service to that point, it appeared to me that these nine DJs were repeat copyright infringers. These DJs tended to upload infringing content to Spinrilla on a regular basis, often through mixtape “series.” These “series” included DJ Dirty Dollarz’s weekly “Hot This Week” mixtapes, DJ Creative Mind’s monthly “Tracks of the Month” mixtapes, and DJ Fiestaboi’s weekly “Bangers of the Week” mixtapes. I was also concerned about these DJs because they are responsible for uploading some of the most streamed and downloaded “mixtapes” on Spinrilla, according to charts published on the service. For example, as of August 10, 2016, five of the ten most popular mixtapes on Spinrilla were uploaded by DJ Miles, DJ

Dirty Dollarz, and DJ Fiestaboi. Further, my research has revealed that the “mixtapes” of DJ Dirty Dollarz, DJ Miles, DJ 837, and DJ Trey Cash generated higher cumulative download and stream counts than 99% of those credited to all other “mixtape artists” and “mixtape hosts” on Spinrilla.

14. The Takedown Notices issued during the Repeat Infringer Study identified a total of 286 sound recordings uploaded by the Repeat Infringers, as identified in the table below:

Repeat Infringer	Takedown notices identifying Repeat Infringer	Sound recordings identified
DJ Dirty Dollarz	23	78
DJ Miles	21	46
DJ HyDef	19	39
DJ Creative Mind	18	38
DJ ASAP	16	30
DJ Trey Cash	7	14
DJ 837	7	14
HurricaneMixtapes.com	7	14
DJ Fiestaboi	6	13

15. All of the 286 sound recordings identified in the Takedown Notices were identical or near identical copies of Plaintiffs’ copyrighted sound recordings.

My team and I were able to confirm this by comparing the sound recordings identified in the Takedown Notices with the commercially available versions of the same tracks. In some cases, my team and I utilized listening software to facilitate this comparison.

16. All of the 286 sound recordings identified in the Takedown Notices were made available on Spinrilla for free download and streaming by the public.

17. The Takedown Notices identified unique URLs where each of the 286 sound recordings could be located on Spinrilla. Fully 263 of these URLs included the name of the Repeat Infringer who uploaded the sound recording to Spinrilla. For example, a takedown notice sent on July 27, 2016 identified six URLs from which Plaintiffs' sound recordings could be streamed or downloaded. These URLs made clear that two sound recordings were uploaded by DJ Dirty Dollarz, two by DJ Miles, and one by DJ Fiestaboi:

https://spinrilla.com/mixtapes/dj-miles-tracks-of-the-month-april-edition-2016	Drake Pop Style
https://spinrilla.com/mixtapes/dj-fiestaboi-bangers-of-the-week	Future Rich Sex
https://spinrilla.com/mixtapes/various-artists-finessin-the-streets-vol-1	Post Malone White Iverson
https://spinrilla.com/mixtapes/dj-dirty-dollarz-hot-this-week-59	Pusha T Drug Dealers Anonymous (feat. JAY Z)
https://spinrilla.com/mixtapes/dj-miles-tracks-of-the-month-february-edition	Tinashe All Hands On Deck
https://spinrilla.com/mixtapes/dj-dirty-dollarz-hot-this-week-12	Travis Scott Antidote

18. Spinrilla has not terminated the artist accounts of eight out of nine of the Repeat Infringers, who collectively uploaded 272 of the 286 infringing sound

recordings identified in the Takedown Notices. As described in detail below, these artist accounts have continued to operate on Spinrilla without interruption, have continued to maintain an active presence on Spinrilla, and have continued to upload infringing content to Spinrilla on a regular basis.

19. On July 20, 2017, I visited the Spinrilla website and the Spinrilla mobile apps to search for the terms of any repeat infringer policy maintained by Defendants. I was unable to find a statement or explanation of any such policy on either the website or apps.

20. I visited the Spinrilla website and the Spinrilla mobile apps again on July 26, 2017, and discovered a new “Terms of Service” page (available at <https://spinrilla.com/tos>) stating that it had been “updated” on July 23, 2017, although no such terms of service accessible through a “Terms” tab at the bottom of the Spinrilla.com website were available in any of my prior visits. This page provided, for the first time anywhere on the Spinrilla website or the Spinrilla mobile apps, a stated policy regarding “Repeat Infringement.”

Repeat Infringement by DJ Miles

21. Between July 27, 2016 and October 31, 2016, the RIAA sent Spinrilla 19 takedown notices reporting 42 different infringing tracks that DJ Miles uploaded to Spinrilla via 23 different mixtapes.

22. On July 20, 2017, I visited the Spinrilla site and apps and confirmed that DJ Miles's artist account remains active.

23. Since October 31, 2016, DJ Miles has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla.

24. On December 30, 2016, DJ Miles uploaded a mixtape to Spinrilla entitled "Tracks of the Month (December Edition) (2016)." As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment's sound recordings "Someday" by the artist Lil Bibby. As of July 20, 2017, this track had been downloaded over 84,000 times and streamed over 169,000 times on Spinrilla. This mixtape also includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation's sound recordings "Playa No More (feat. A Boogie With Da Hoodie & Quavo)" and "New Day" by the artist PnB Rock. As of July 20, 2017, these tracks had been collectively downloaded over 182,000 times and streamed over 296,000 times on Spinrilla.

25. On January 27, 2017, DJ Miles uploaded a mixtape to Spinrilla entitled “Tracks of the Month (January Edition) (2017).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Thought It Was A Drought” by the artist Lil Bibby. As of July 20, 2017, this track had been downloaded over 81,000 times and streamed over 127,000 times on Spinrilla. This mixtape also includes unauthorized and infringing copies of Plaintiff Atlantic Recording Corporation’s sound recordings “Notice Me,” “Hanging Up My Jersey (feat. Ty Dolla \$ign),” “Plans,” “Misunderstood,” and “Playa No More (feat. A Boogie With Da Hoodie & Quavo),” by the artist PnB Rock. As of July 20, 2017, these tracks had been collectively downloaded over 643,000 times and streamed over 1.9 million times on Spinrilla.

26. On February 13, 2017, DJ Miles uploaded a mixtape to Spinrilla entitled “Tracks of the Year (2016).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation’s sound recording “Guwop (feat. Quavo, Offset & Young Scooter)” by the artist Young Thug. As of July 20, 2017, this track had been downloaded over 77,000 times and streamed over 163,000 times on Spinrilla. This mixtape also includes an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.’s sound recording “Key to

the Streets (feat. Migos & Trouble)” by the artist YFN Lucci. As of July 20, 2017, this track had been downloaded over 79,000 times and streamed over 127,000 times on Spinrilla.

27. On February 24, 2017, DJ Miles uploaded a mixtape to Spinrilla entitled “Tracks of the Month (February Edition) (2017).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes unauthorized and infringing copies of Plaintiff UMG Recordings, Inc.’s sound recordings “Roses” by the artist BJ the Chicago Kid, and “First Fuck” by the artist 6lack. As of July 20, 2017, these tracks had been collectively downloaded over 159,000 times and streamed over 402,000 times on Spinrilla. This mixtape also includes unauthorized and infringing copies of Plaintiff Atlantic Recording Corporation’s sound recordings “Nobody Else But You” by the artist Trey Songz and “Distance” by the artist Omarion. As of July 20, 2017, these tracks had been collectively downloaded over 184,000 times and streamed over 511,000 times on Spinrilla. This mixtape also includes an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.’s sound recording “Never Worried” by the artist YFN Lucci. As of July 20, 2017, this track had been downloaded over 123,000 times and streamed over 388,000 times on Spinrilla. This mixtape also includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Hip Hopper (feat. Lil Yachty)” by the artist Blac Youngsta. As of July

20, 2017, this track had been downloaded over 120,000 times and streamed over 462,000 times on Spinrilla.

28. On March 31, 2017, DJ Miles uploaded a mixtape to Spinrilla entitled “Tracks of the Month (March Edition) (2017).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “Holy Ghost” by the artist Desiigner. As of July 20, 2017, this track had been downloaded over 73,000 times and streamed over 307,000 times on Spinrilla.

29. On April 28, 2017, DJ Miles uploaded a mixtape to Spinrilla entitled “Tracks of the Month (April Edition) (2017).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “Dreaming (feat. Tory Lanez)” by the artist Mark Battles. As of July 20, 2017, this track had been downloaded over 68,000 times and streamed over 176,000 times on Spinrilla.

30. On May 31, 2017, DJ Miles uploaded a mixtape to Spinrilla entitled “Tracks of the Month (May Edition) (2017).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “We So Proud Of Him” by the artist Playboi Carti. As of July 20, 2017,

this track had been downloaded over 60,000 times and streamed over 180,000 times on Spinrilla. This mixtape also includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment's sound recording "A Man" by the artist Travis Scott. As of July 20, 2017, this track had been downloaded over 68,000 times and streamed over 224,000 times on Spinrilla.

Repeat Infringement by DJ Dirty Dollarz

31. Between July 26, 2016 and November 3, 2016, the RIAA sent Spinrilla 22 takedown notices reporting 80 different infringing tracks that DJ Dirty Dollarz uploaded to Spinrilla via 80 different mixtapes. These tracks included recordings by such well-known major label artists as Bruno Mars, The Weeknd, Missy Elliott, Common, and Ludacris. These mixtapes were released on a weekly basis, from April 9, 2015 through October 29, 2016, and were entitled "Hot This Week" numbers 1 through 80.

32. Spinrilla has not terminated DJ Dirty Dollarz's account, even though every single one of this user's weekly mixtapes from April 9, 2015 through October 29, 2016 contained a sound recording that the RIAA identified to Spinrilla as infringing. An investigator for the RIAA visited the Spinrilla site and apps on July 20, 2017 and has confirmed that DJ Dirty Dollarz's artist account remains active.

33. Since October 29, 2016, DJ Dirty Dollarz has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla.

34. On November 5, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 81.” On November 11, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “Pyramids” by the artist Common. The sound recording was removed from the mixtape.

35. On November 12, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 82.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. On December 21, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s track “Outkast (feat. Ty Dolla \$ign)” by the artist Belly. The sound recording was removed from the mixtape. However, this mixtape has included and continues to include an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s track “Mad Ting Sad Ting” by the artist Fekky. As of July 20, 2017, this track had been downloaded over 30,000 times and streamed over 50,000 times on Spinrilla. This mixtape also includes Plaintiff Sony Music Entertainment’s sound recording

“Unforgettable” by the artist French Montana. As of July 20, 2017, this track had been downloaded over 41,000 times and streamed over 284,000 times on Spinrilla.

36. On November 19, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 83.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. On December 21, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Crave” by the artist Pharrell Williams. The sound recording was removed from the mixtape.

37. On November 26, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 84.” On December 21, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “Six Feet Under (feat. Future)” by the artist The Weeknd. The sound recording was removed from the mixtape.

38. On December 3, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 85.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. On December 21, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.’s track

“Motto” by the artist Curren\$y. The sound recording was removed from the mixtape. However, this mixtape has included and continues to include an unauthorized and infringing copy of Plaintiff Warner Bros Records. Inc.’s sound recording “Washingtons By Your Side” by the artist Wiz Khalifa. As of July 20, 2017, this track had been downloaded over 27,000 times and streamed over 188,000 times on Spinrilla.

39. On December 10, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 86.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. On December 21, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Vengeance On My Mind (feat. Dana)” by the artist G-Eazy. The sound recording was removed from the mixtape. However, this mixtape has included and continues to include an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Unforgettable” by the artist French Montana. As of July 20, 2017, this track had been downloaded over 35,000 times and streamed over 270,000 times on Spinrilla.

40. On December 24, 2016, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 87 (Special Edition).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. On February 3, 2017, an

RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Moves" by the artist Big Sean. The sound recording was removed from the mixtape. However, this mixtape has included and continues to include an unauthorized and infringing copy of Plaintiff Sony Music Entertainment's sound recording "Someday" by the artist Lil Bibby. As of July 20, 2017, this track had been downloaded over 72,000 times and streamed over 422,000 times on Spinrilla. This mixtape also has included and continues to include an unauthorized and infringing copy of Plaintiff Sony Music Entertainment's sound recording "H.O.E. (Heaven On Earth) (feat. Ty Dolla \$ign)" by the artist LunchMoney Lewis. As of July 20, 2017, this track had been downloaded over 37,000 times and streamed over 52,000 times on Spinrilla.

41. On January 7, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled "Hot This Week 88." On February 3, 2017, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.'s sound recording "T-Shirt" by the artist Migos. The sound recording was removed from the mixtape and the mixtape no longer appears on Spinrilla.

42. On January 14, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled "Hot This Week 89." On February 3, 2017, an RIAA investigator sent

Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation's sound recording "Do U Dirty" by the artist Kehlani. The sound recording was removed from the mixtape.

43. On January 21, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled "Hot This Week 90." On February 3, 2017, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Moonboots (Bonus Track)" by the artist Chief Keef. The sound recording was removed from the mixtape.

44. On January 28, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled "Hot This Week 91." On February 3, 2017, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation's sound recording "I'm Better (feat. Lamb)" by the artist Missy Elliott. The sound recording was removed from the mixtape.

45. On February 4, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled "Hot This Week 92." On February 4, 2017, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape includes unauthorized and infringing copies of Plaintiffs' sound recordings, including "Swish

(feat. 2 Chainz)” by the artist Kid Ink (Plaintiff Sony Music Entertainment), “When We Party (feat. Snoop Dogg)” by the artist Faith Evans (Plaintiff Warner Bros. Records Inc.), “I Don’t (feat. YG)” by the artist Mariah Carey (Plaintiff Sony Music Entertainment), “Word Around Town (feat. Choo Jackson)” by the artists Riff Raff & DJ Afterthought (Plaintiff UMG Recordings, Inc.), and “Addicted (feat. Kirko Bangz)” by the artist Slim Thug (Plaintiff UMG Recordings, Inc.). The sound recordings were removed from the mixtape and the mixtape no longer appears on Spinrilla.

46. On March 4, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 96.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation’s sound recording “XO TOUR Llif3” by the artist Lil Uzi Vert. As of July 20, 2017, this track had been downloaded over 124,000 times and streamed over 530,000 times on Spinrilla.

47. On March 11, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 97.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recording Inc.’s sound recording “Wokeuplikethis (feat. Lil Uzi Vert)” by the artist Playboi Carti. As of July 20, 2017, this track had been downloaded over 122,000 times and streamed over 686,000 times on Spinrilla.

48. On April 22, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 101.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation’s sound recording “Feel It” by the artist Young Thug. As of July 20, 2017, this track had been downloaded over 51,000 times and streamed over 339,000 times on Spinrilla.

49. On May 20, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 105.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Butterfly Effect” by the artist Travi\$ Scott. As of July 20, 2017, this track had been downloaded over 106,000 times and streamed over 44,000 times on Spinrilla.

50. On May 27, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 106.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation’s sound recording “Stoned” by the artist Wiz Khalifa. As of July 20, 2017, this track had been downloaded over 18,000 times and streamed over 94,000 times on Spinrilla.

51. On June 3, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled “Hot This Week 107.” As of July 20, 2017, this mixtape remained accessible

to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "We So Proud Of Him" by the artist Playboi Carti. As of July 20, 2017, this track had been downloaded over 13,000 times and streamed over 54,000 times on Spinrilla.

52. On June 10, 2017, DJ Dirty Dollarz uploaded a mixtape to Spinrilla entitled "Hot This Week 108." As of July 20, 2017, this mixtape remains accessible to the public on Spinrilla and has been downloaded over 18,000 times and streamed over 91,000 times. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Euro (Switch Hands)" by the artist Kanye West. As of July 20, 2017, this track had been downloaded over 236,000 times and streamed over 171,000 times.

Repeat Infringement by DJ Creative Mind

53. Between April 27, 2016 and October 14, 2016, the RIAA sent Spinrilla 16 takedown notices reporting 33 different infringing tracks that DJ Creative Mind uploaded to Spinrilla via 19 different mixtapes.

54. Since October 14, 2016, DJ Creative Mind has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla. An investigator for the RIAA visited the Spinrilla site and apps on July 20, 2017 and has confirmed that DJ Creative Mind's artist account remains active.

55. On October 28, 2016, DJ Creative Mind uploaded a mixtape to Spinrilla entitled “The Hit List (October Edition).” On November 3, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment’s sound recording “Runner (feat. A\$AP Ant and Lil Uzi Vert)” by the artist A\$AP Mob. As of January 19, 2017, that sound recording had not been removed from the mixtape and remained accessible to the public on the Spinrilla website. On November 11, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this same mixtape also includes an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.’s sound recording “Blessed Up” by the artist Meek Mill. That sound recording was removed from the mixtape.

56. On January 1, 2017, DJ Creative Mind uploaded a mixtape to Spinrilla entitled “The Hit List (December Edition).” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.’s sound recording “Everyday We Lit (feat. PnB Rock)” by the artist YFN Lucci. As of July 20, 2017, this track had been downloaded over 5,000 times and streamed over 22,000 times on Spinrilla.

Repeat Infringement by DJ 837

57. Between September 21, 2016 and November 11, 2016, the RIAA sent Spinrilla 7 takedown notices reporting 14 different infringing tracks that DJ 837 uploaded to Spinrilla via 13 different mixtapes.

58. Since November 11, 2016, DJ 837 has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla. An investigator for the RIAA visited the Spinrilla site and apps on July 20, 2017 and has confirmed that DJ 837's artist account remains active.

59. On April 12, 2017, DJ 837 uploaded a mixtape to Spinrilla entitled "Black Savage (Kodak & 21 Savage)." As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes unauthorized and infringing copies of two of Plaintiff Atlantic Recording Corporation's sound recordings: "Coolin and Booted" and "Candy Paint (feat. Bun B)" by the artist Kodak Black. As of July 20, 2017, these tracks had been collectively downloaded over 110,000 times and streamed over 278,000 times on Spinrilla.

60. On April 16, 2017, DJ 837 uploaded a mixtape to Spinrilla entitled "Codeine Bangerz 2." As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes unauthorized and infringing copies of Plaintiff UMG Recordings, Inc.'s sound recordings "Peek A Boo (feat. Migos)" by

the artist Lil Yachty and “Money Fold” by the artist Rich Homie Quan. As of July 20, 2017, these tracks had been collectively downloaded over 170,000 times and streamed over 1.2 million times on Spinrilla.

61. On April 21, 2017, DJ 837 uploaded a mixtape to Spinrilla entitled “Codeine Bangerz 3.” As of July 20, 2017, this mixtape remains accessible to the public on Spinrilla and has been downloaded over 24,000 times and streamed over 117,000 times. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “DNA” by the artist Kendrick Lamar. As of July 20, 2017, this track had been downloaded over 51,000 times and streamed over 216,000 times on Spinrilla.

62. On June 25, 2017, DJ 837 uploaded a mixtape to Spinrilla entitled “Dat Fix.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes unauthorized and infringing copies of Plaintiff UMG Recordings, Inc.’s sound recordings “Yah Mean” and “Other Shit” by the artist Playboi Carti, “Sleep When U Die” and “Trap Check” by the artist 2 Chainz, and “Black” by the artist The Dream. As of July 20, 2017, these tracks had been collectively downloaded over 39,000 times and streamed over 152,000 times on Spinrilla. This mixtape also includes unauthorized and infringing copies of Plaintiff Atlantic Recording Corporation’s sound recordings “Helpless,” “Both Eyes Closed,” and “Tone It Down” by the artist Gucci Mane, and “Relationship” and “For

Y'all” by the artist Young Thug. As of July 20, 2017, these tracks had been collectively downloaded over 59,000 times and streamed over 315,000 times on Spinrilla.

Repeat Infringement by DJ Fiestaboi

63. Between July 27, 2016 and August 11, 2016, the RIAA sent Spinrilla 6 takedown notices reporting 13 different infringing tracks that DJ Fiestaboi uploaded to Spinrilla via 13 different mixtapes.

64. Since August 11, 2016, DJ Fiestaboi has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla. An investigator for the RIAA visited the Spinrilla site and apps on July 20, 2017 and has confirmed that DJ Fiestaboi's artist account remains active.

65. On April 22, 2017, DJ Fiestaboi uploaded a mixtape to Spinrilla entitled “Bangers of the Week 24.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes unauthorized and infringing copies of Plaintiff UMG Recordings, Inc.'s sound recordings “Magnolia” and “Let It Go” by the artist Playboi Carti. As of July 20, 2017, these tracks had been collectively downloaded over 77,000 times and streamed over 400,000 times on Spinrilla.

Repeat Infringement by DJ HyDef

66. Between August 3, 2016 and October 14, 2016, the RIAA sent Spinrilla 16 takedown notices reporting 34 different infringing tracks that DJ HyDef uploaded to Spinrilla via 26 different mixtapes.

67. Since October 14, 2016, DJ HyDef has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla. An investigator for the RIAA visited the Spinrilla site and apps on July 20, 2017 and has confirmed that DJ HyDef's artist account remains active.

68. On October 17, 2016, DJ HyDef uploaded a mixtape to Spinrilla entitled "Traptivity 17." As of July 20, 2017, this mixtape remains accessible to the public on Spinrilla and has been downloaded over 1,000 times and streamed over 15,000 times. On November 11, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Free Agent" by the artist Big K.R.I.T. The sound recording was removed from the mixtape.

69. On November 3, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that the mixtape "Money & Hoes 21," uploaded to Spinrilla by DJ HyDef, included an unauthorized and infringing copy of

Plaintiff UMG Recordings, Inc.’s sound recording “How Does It Feel” by the artist Kamaiyah. As of January 19, 2017, this track and its associated mixtape had not been removed from Spinrilla. “Money and Hoes 21” has been downloaded over 2,000 times and streamed over 11,000 times.

70. The RIAA’s November 3, 2016 takedown notice also informed Defendants that the mixtape “Traptivity 15,” uploaded to Spinrilla by DJ HyDef, included an unauthorized and infringing copy of Plaintiff Warner Bros. Records Inc.’s sound recording “Ran It Up (feat. Young Thug)” by the artist Rich The Kid. As of July 20, 2017, “Ran It Up (feat. Young Thug)” and its associated mixtape had not been removed from Spinrilla. As of July 20, 2017, “Ran It Up (feat. Young Thug)” had been downloaded over 6,400 times and streamed over 24,000 times on Spinrilla.

Repeat Infringement by DJ ASAP

71. Between August 11, 2016 and October 4, 2016, the RIAA sent Spinrilla 12 takedown notices reporting 24 different infringing tracks that DJ ASAP uploaded to Spinrilla via 17 different mixtapes.

72. Since October 4, 2016, DJ ASAP has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla. An investigator for the RIAA visited the

Spinrilla site and apps on July 20, 2017 and has confirmed that DJ ASAP's artist account remains active.

73. On October 9, 2016, DJ ASAP uploaded a mixtape to Spinrilla entitled "Trap Celebrity 14." As of July 20, 2017, this mixtape remains accessible to the public on Spinrilla and has been downloaded over 700 times and streamed over 3,000 times. On October 14, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation's sound recording "Oh Lord" by the artists Gucci Mane and Lil Wayne. The sound recording was removed from the mixtape. On November 3, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this same mixtape also includes an unauthorized and infringing copy of Plaintiff Atlantic Recording Corporation's sound recording "Black Moses (feat. Priscilla Renea)" by the artists Meek Mill and Pusha T. As of July 20, 2017, that sound recording had not been removed from the mixtape, still remained accessible to the public on the Spinrilla website, and had been downloaded over 500 times and streamed over 2,700 times.

74. On February 25, 2017, DJ ASAP uploaded a mixtape to Spinrilla entitled "Straight Outta Trap House 18." As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff Sony Music Entertainment's sound recording "Hip

Hopper (feat. Lil Yachty)” by the artist Blac Youngsta. As of July 20, 2017, this track had been downloaded over 15,000 times and streamed over 61,000 times on Spinrilla.

75. On April 10, 2017, DJ ASAP uploaded a mixtape to Spinrilla entitled “Straight Outta Trap House 19.” As of July 20, 2017, this mixtape remained accessible to the public on Spinrilla. This mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.’s sound recording “Brick” by the artist Trouble. As of July 20, 2017, this track had been downloaded over 1,900 times and streamed over 17,000 times on Spinrilla.

Repeat Infringement by DJ Trey Cash

76. Between September 21, 2016 and October 31, 2016, the RIAA sent Spinrilla 5 takedown notices reporting 10 different infringing tracks that DJ Trey Cash uploaded to Spinrilla via 10 different mixtapes. The titles of these mixtapes included “2pac (Greatest Hitz),” “The Best of Chris Brown,” “The Best of Usher,” and “OvO (The Best of Drake 1).” 2Pac, Chris Brown, Usher, and Drake are among the world’s most successful and popular artists and are each signed to one of the Plaintiffs.

77. Since October 31, 2016, DJ Trey Cash has continued to upload infringing content to Spinrilla. As of the date of this filing, that infringing content remains accessible to the public via Spinrilla. An investigator for the RIAA visited

the Spinrilla site and apps on July 20, 2017 and has confirmed that DJ Trey Cash's artist account remains active.

78. On October 31, 2016, DJ Trey Cash uploaded a mixtape to Spinrilla entitled "We Finally Made it Radio Vol. 5." On November 3, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape includes an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Close to You (remix) feat. T-Pain and Rick Ross" by the artist Dreezy. The sound recording was removed from the mixtape. On November 11, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this same mixtape also included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Want Her (feat. Quavo and YG)" by the artist DJ Mustard. The sound recording was removed from the mixtape.

79. As of July 20, 2017, Spinrilla's website advertised several "upcoming mixtapes" from DJ Trey Cash, including a mixtape entitled "OvO (The Best of Drake 3)." A page dedicated to this future release indicates that the mixtape will be "the best Drake collection" and will be "dropping soon." Even though the page does not yet feature any sound recordings, it has already been viewed over 14,000 times.

Repeat Infringement by HurricaneMixtapes.com

80. Between July 22, 2016 and November 11, 2016, the RIAA sent Spinrilla 8 takedown notices reporting 15 different infringing tracks that HurricaneMixtapes.com uploaded to Spinrilla via 15 different mixtapes.

81. On November 5, 2016, HurricaneMixtapes.com uploaded a mixtape to Spinrilla entitled "Highlights Vol. 27." On November 11, 2016, an RIAA investigator sent Defendants a takedown notice informing Defendants that this mixtape included an unauthorized and infringing copy of Plaintiff UMG Recordings, Inc.'s sound recording "Got Me F****d Up (feat. Dreezy)" by the artist Keke. The sound recording was removed from the mixtape.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 28, 2017 in Washington, D.C.



Carlos Linares